

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND
DEVELOPMENT,**
Plaintiff,

v.

**CANON INC. AND CANON U.S.A.,
INC.**
Defendants.

CIVIL ACTION 6:20-cv-00980-ADA-DTG

JOINT NOTICE OF SETTLEMENT AND MOTION TO STAY ALL DEADLINES

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“Brazos”) and Defendants Canon Inc. and Canon U.S.A., Inc. (“Canon”) (collectively, “Parties”) by and through their undersigned counsel, file this Joint Notice of Settlement and Motion to Stay All Deadlines.

The Parties hereby notify the Court that a settlement in principle has been reached to resolve all matters in controversy asserted by Brazos’s Complaint (Dkt. 70).¹ Accordingly, the Parties request a stay of all deadlines in the Amended Scheduling Order and amendments thereto (Dkts. 182, 186) to allow for negotiations to be finalized and the Parties to submit a motion to dismiss all claims and counterclaims at issue.

The Parties expect to file dismissal papers within thirty (30) days.

¹ The settlement in principle also resolves the additional proposed claims that were the subject of Brazos’s pending motion to amend seeking, *inter alia*, leave to file a third amended complaint. Dkt. 176.

In light of this settlement and impending dismissal, the Parties respectfully request the Court stay all impending deadlines until September 19, 2022.

Dated: August 19, 2022

Respectfully Submitted

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Attorneys for Plaintiff

WSOU INVESTMENTS, LLC d/b/a

BRAZOS LICENSING AND

DEVELOPMENT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served or delivered electronically to all counsel of record on this 19th day of August, 2022, via the Court's CM/ECF system.

/s/ Jonathan K. Waldrop
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